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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
OPPOSITION TO WAYMO LLC'S  
MOTION FOR SANCTIONS (DKT. 1955)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion  
7 to File Under Seal Portions of Its Opposition to Waymo LLC’s Motion for Sanctions (“Administrative  
8 Motion”). The Administrative Motion seeks an order sealing the highlighted portions of Otto  
9 Trucking’s Opposition to Waymo LLC’s Motion for Sanctions (“Otto Trucking’s Opposition”),  
10 Exhibit 4 to the Lin Declaration, and the Declaration of Todd Boock in Support of Opposition to  
11 Motion to Sanctions, as well as the entirety of Exhibit 8 to the Boock Declaration.

12 3. Otto Trucking’s Opposition (portions highlighted in yellow), Exhibit 4 (green  
13 highlighted portions in version filed herewith), and Exhibit 8 to the Boock Declaration (green  
14 highlighted portions in version filed herewith) contain, reference, and/or describe Waymo’s highly  
15 confidential and sensitive business information. Such information includes confidential details  
16 regarding Waymo’s security measures and protocols and detailed computer forensics regarding access  
17 to Waymo’s trade secrets. I understand that Waymo maintains this information as confidential. The  
18 public disclosure of this information would cause significant competitive harm to Waymo, as its  
19 security measures and computer forensics methods would become known to competitors who could  
20 use such information to Waymo’s disadvantage.

21 4. Exhibit 4 (green highlighted portions in version of Exhibit 4 filed herewith)  
22 additionally contains email addresses and/or phone numbers of Waymo employees and former  
23 employees involved in this case, the disclosure of which would cause Waymo and those employees  
24 substantial harm due to the high public profile of this litigation.

25 5. Otto Trucking’s Opposition (portions highlighted in yellow), and Exhibit 4 (green  
26 highlighted portions in version of Exhibit 4 filed herewith) additionally contain highly sensitive  
27 information that Waymo seeks to seal. Specifically, those portions contain the domains that host  
28 Waymo’s highly confidential SVN repository and other computer systems. Public disclosure of such

1 information will give bad actors seeking to hack Waymo's databases a target to attack. Further, there  
2 is no public purpose served by disclosing the precise web or IP address at which the servers reside.

3 6. Waymo's request to seal is narrowly tailored to those portions of Otto Trucking's  
4 Opposition and Exhibit 4 that merit sealing.

5  
6 I declare under penalty of perjury under the laws of the State of California and the United  
7 States of America that the foregoing is true and correct, and that this declaration was executed in San  
8 Francisco, California, on October 9, 2017.

9 By /s/ Felipe Corredor

10 Felipe Corredor

11 Attorneys for WAYMO LLC

12  
13 **ATTESTATION**

14 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
15 document has been obtained from Felipe Corredor.

16  
17 By: /s/ Charles K. Verhoeven

18 Charles K. Verhoeven